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September 24, 2017

Via Hand Delivery

Louie Zamaroni, Owner/Operator
Michael Hegarty, Operations Manager
Zamaroni Quarry, Inc.
3500 Petaluma Hill Road
Santa Rosa, CA 95404

**Re: 60-Day Notice of Violations and Intent to File Suit Under the Federal Water
Pollution Control Act ("Clean Water Act")**

To Officers, Directors, Operators, Property Owners and/or Facility Managers of Zamaroni Quarry, Inc., dba Wheeler Zamaroni Stone Fabrication & Landscape Supply ("Zamaroni"):

The California Environmental Protection Association ("CEPA") provides this 60-day Notice of violations of the Federal Clean Water Act ("CWA" or "Act") 33 U.S.C. § 1251 *et seq.*, that CEPA believes are occurring at the Zamaroni facility located at 3500 Petaluma Hill Road in Santa Rosa, California ("the Facility" or "the site"). Pursuant to CWA §505(b) (33 U.S.C. §1365(a)), this 60-day Notice of violations ("Notice") is being sent to you as the responsible property owners, officers, operators or managers of the Facility, as well as to the U.S. Environmental Protection Agency ("EPA"), the U.S. Attorney General, the California State Water Resources Control Board ("SWRCB"), and the California North Coast Regional Water Quality Control Board ("RWQCB").

CEPA is a Sonoma County-based environmental citizen's group established under the laws of the State of California to protect, enhance, and assist in the restoration of all rivers, creeks, streams, wetlands, vernal pools, and tributaries of California.

This Notice addresses the violations of the CWA and the terms of California's Statewide General Permit for Dischargers of Storm Water for Industrial Activities ("General Permit") arising from the unlawful discharge of pollutants from the Facility into the Mark West and Santa Rosa Creeks, the Laguna de Santa Rosa and the Russian River (which is listed as impaired for sediment, temperature, and bacteria under CWA §303(d)).

Zamaroni (the "Discharger") is hereby placed on formal notice by CEPA that after the expiration of sixty (60) days from the date this Notice was delivered, CEPA will be entitled to bring suit in the United States District Court against the Discharger for continuing violations of an

effluent standard or limitation, National Pollutant Discharge Elimination System (“NPDES”) permit condition or requirement, or Federal or State Order issued under the CWA (in particular, but not limited to, § 301(a), § 402(p), and § 505(a)(1)), as well as the failure to comply with requirements set forth in the Code of Federal Regulations and the North Coast RWQCB Water Quality Control Plan or “Basin Plan”.

I. THE SPECIFIC STANDARD, LIMITATION, OR ORDER VIOLATED

The Discharger filed a Notice of Intent (“NOI”) on July 15, 2015, with respect to the Facility, agreeing to comply with the terms and conditions of the General Permit. The SWRCB approved the NOI, and the Discharger was assigned Waste Discharger Identification (“WDID”) number 1 49I012744.

However, in its operations of the Facility, the Discharger has failed and is failing to comply with specific terms and conditions of the General Permit as described in Section II below. These violations are continuing in nature. Violations of the General Permit are violations of the CWA, specifically CWA § 301(a) and CWA § 402(p). Therefore, the Discharger has committed ongoing violations of the substantive and procedural requirements of CWA § 402(p) and of NPDES Permit No. CAS000001, State Water Resources Control Board Order 2014-0057-DWQ (the “General Permit”) relating to industrial activities at the Facility.

II. VIOLATIONS OF THE CLEAN WATER ACT AND GENERAL PERMIT

A. Facility Operations

According to the Facility’s current Storm Water Pollution Prevention Plan, the primary operations at the Zamaroni Facility include Custom Stone Fabrication Services, retail and wholesale sales of Landscaping Materials, and Custom Ready-mix Concrete Batching. According to the company’s website (located at <http://www.wzsupply.com/products/soil.html>) the Facility also manufactures, and mixes soil amendments. The website states, “Wheeler Zamaroni has long been an industry leader in the manufacture of soil mixes and amendments.” Their website further states, “Zamaroni manufactures specialty soil mixes to meet the needs of your special plants.” “Wheeler Zamaroni also manufactures soil mixes for other specialty landscape uses, such as bocce ball courts, baseball infields and equestrian areas.”

The Facility receives raw and intermediate products by truck delivery. The various final products are made from granite, marble, limestone, travertine, sandstone and other stones. Additionally, the Facility receives assorted lawn, garden and landscaping materials by trucks from vendors. Products include bark, mulch, soil/loam mixes, amendments, decorative stones and pavers among other products. The Facility also stocks permeable pavers, stone veneers, assorted bricks, bagged products, (cement, mortar, etc.) and other landscaping/building supplies. The

Facility has a small concrete ready-mix Facility to the rear, and a small dedicated area to drywall/gypsum recycling.

Facility operations are covered under Standard Industry Classification (SIC) Codes: 1423 – Crushed and Broken Granite; 3273 – Concrete Ready Mix; 5261 – Retail Nurseries, Lawn and Garden Supply Stores; and 2875 – Fertilizers, Mixing Only.

Site operations take place primarily outdoors on a site that discharges indirectly into the Mark West, and Santa Rosa Creeks, and the Laguna de Santa Rosa, and eventually enters the navigable waters of the Russian River, all of which are in proximity to the Facility. Because the real property on which the Facility is located is subject to rain events, the range of pollutants discharged from the Facility and identified in this Notice can indirectly discharge to the Russian River.

B. Zamaroni's Specific Violations

1. *Inadequate and Deficient SWPPP*

Zamaroni's current Storm Water Pollution Prevention Plan ("SWPPP") for the Facility is inadequate and fails to comply with the requirements of the General Permit as specified in Section X of Order No. 2014-0057-DWQ. Failure to develop or implement an adequate SWPPP, or update or revise an existing SWPPP as required, is a violation of Sections II.B.4.f and X of the General Permit.

a. *Vactor truck wastes*

On January 29, 2016, North Coast Regional Water Board Inspector Paul Keiran inspected the facility and noted the following: "Zamaroni receives Vactor truck wastes for onsite disposal. Their SWPPP must identify this activity and state pollution controls for this activity."

Vactor Truck wastes (which contain the contents of vacuumed catch basins) are documented sources of at least the following contaminants: lead, PCBs, PAHs, and fecal coliform bacteria.

b. *SIC Code 2875*

Section XI.B.6.d and Table 1 of the General Permit direct that additional parameters must be tested based on the Facility's primary SIC codes. SIC code 2875 – Fertilizers, Mixing Only describes establishments primarily engaged in mixing fertilizers from purchased fertilizer materials. This includes compost, fertilizers, mixed: made in plants not manufacturing fertilizer, and potting soil, mixed.

Zamaroni's own website states that "Wheeler Zamaroni has long been an industry leader in the manufacture of soil mixes and amendments." These soil mixes include Zamaroni manufacturing specialty soil mixes for specialty plants. However, the Facility SWPPP fails to include SIC Code 2875 in addition to the Facility SIC Code 5261 for retail and whole sales of the soil amendments that Zamaroni mixes.

Zamaroni revised its SWPPP on July 25, 2017. However, its revised SWPPP did not mention Vactor truck wastes disposal as part of the Facility's ongoing operations, nor did it indicate pollution controls for this activity.

Further, Zamaroni's revised SWPP on July 25, 2017, did not identify the mixing of soil components, nor did it indicate pollution controls for this activity.

Based on the foregoing, Zamaroni's current SWPPP is deficient in the following areas:

A. Potential Pollutant Sources

1. List of Industrial Materials

Pursuant to Section X.F of the General Permit, Dischargers must ensure their SWPPP includes a list of industrial materials handled at the facility, and the locations where each material is stored, received, shipped, and handled, as well as the typical quantities and handling frequency.

The Discharger's SWPPP failed to contain a complete list of Industrial Materials utilized in its process of disposing of Vactor truck wastes, as well as the process of soil mixing as specified above.

2. Description of Potential Pollutant Sources

Pursuant to Section X.G of the General Permit, SWPPPs must include a detailed description of potential pollutant sources in their industrial processes, material handling and storage areas, and dust and particulate generating activities. (General Permit §X.G.1)

The Discharger's SWPPP failed to include a detailed description of potential pollutant sources from its industrial processes, material handling and storage areas, dust and particulate generating activities and significant spills and leaks, specifically related to its disposal of Vactor truck wastes, and in soil mixing as outlined above.

3. Assessment of Potential Pollutant Sources

Pursuant to Section X.G.2, Dischargers shall ensure that their SWPPP includes a narrative assessment of all areas of industrial activity with potential industrial pollutant sources.

At a minimum, the assessment must include the following: (a) the areas of the facility with likely sources of pollutants in industrial storm water discharges and authorized non-storm water

discharges (“NSWDs”); (b) the pollutants likely to be present; (c) the approximate quantity, physical characteristics (e.g., liquid, powder, solid, etc.), and locations of each industrial material handled; (d) the degree to which the pollutants associated with those materials may be exposed to and mobilized by storm water; (e) the direct and indirect pathways by which pollutants may be exposed; (f) all sampling, visual observation, and inspection records; (g) the effectiveness of existing Best Management Practices (“BMPs”) to reduce or prevent pollutants in industrial storm water discharges; (h) the estimated effectiveness of implementing minimum BMPs to reduce or prevent pollutants; and (i) identification of the industrial pollutants related to the receiving waters with 303(d) listed impairments, if applicable. (General Permit §X.G.2.a)

Based upon the above, Dischargers are to identify in their SWPPP:

(a) Any areas of the facility where the minimum BMPs described in their SWPPP will not adequately reduce or prevent pollutants in storm water discharges, and identify advanced BMPs for those areas (General Permit § X.G.2.b); (b) any drainage areas with no exposure to industrial activities and materials (General Permit §X.G.2.c); and (c) any additional parameters beyond the required parameters which indicate the presence of pollutants in industrial storm water discharges (General Permit §X.G.2.d).

The Discharger’s SWPPP failed to include an adequate narrative assessment of all areas of industrial activity with potential industrial pollutant sources. Specifically, Zamaroni’s SWPPP omitted an assessment of the potential pollution sources from its disposal of Vactor truck wastes and its soil mixing activities, including a description of necessary minimum and/or advanced BMPs to implement to reduce or prevent pollutants from both Vactor truck waste disposal and soil mixing in industrial storm water discharges at the facility, pursuant to Inspector Keiran’s notes on January 29, 2016, and their own website as outlined above.

In addition, there is an error in the Facility’s SWPPP on page 9, Section 2.1 – Constituents of Concern for Storm Water, in that the parameter of Iron that is of concern for the Facility due to its concrete batch plant operations is omitted. The additional testing parameters for SIC Code 2875 [total nitrogen (N+N); lead (Pb); zinc (Zn); and phosphorous (P)] have also been omitted from the SWPPP.

2. Deficient BMP Implementation

Sections I.C, V.A and X.C.1.b of the General Permit require Dischargers to identify and implement minimum and advanced Best Management Practices (“BMPs”) that comply with the Best Available Technology (“BAT”) and Best Conventional Pollutant Control Technology (“BCT”) requirements of the General Permit to reduce or prevent discharges of pollutants in their storm water discharge in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

Zamaroni has violated and continues to violate the terms and conditions of the General Permit by failing to implement minimum and/or advanced BMPs that utilize BAT and BCT to control the discharge of pollutants in storm water at the Facility.

Specifically, Water Board Inspector Paul Keiran inspected the property on January 6, 2016, and noted issues with stockpiled soils on the upland bench of the Facility and warned the Discharger that the pile was steep and beginning to erode and that it could cause major problems if not addressed.

On July 1, 2016, the Discharger was accelerated to Level 1 Status pursuant to Section XII.C of the General Permit, for exceedances of Total Suspended Solids ("TSS"). Pursuant to the General Permit, the facility was evaluated in October of 2016, and a Level 1 Exceedance Response Evaluation Report was completed and certified on January 1, 2017.

The October 2016 evaluation completed by Jonathan Meronek of SCS Engineers noted the following deficiencies in BMP implementation at the site:

1. Material tracking through site, from upper, north material storage to lower.
2. Detention Ponds needed to be modified to hold more storm water run-off; also, grassy swale and impoundment area post-pond(s) discharge could add increased residence time and settling of suspended solids.
2. *Failure to Collect and Analyze Storm Water Samples Pursuant to the General Permit*

The Discharger has failed to provide the RWQCB with the minimum number of annual documented results of facility run-off sampling as required under Sections XI.B.2 and XI.B.11.a of Order No. 2014-0057-DWQ, in violation of the General Permit and the CWA.

Section XI.B.2 of the General Permit requires that all Dischargers collect and analyze storm water samples from two Qualifying Storm Events ("QSEs") within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30).

A Qualifying Storm Event (QSE) is a precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area.

Furthermore, Section XI.B.11.a requires Dischargers to submit all sampling and analytical results for all individual or Qualified Combined Samples via SMARTS within 30 days of obtaining all results for each sampling event. Section XI.C.6.b provides that if samples are not collected pursuant to the General Permit an explanation must be included in the Annual Report.

As of the date of this Notice, the Discharger has failed to upload into the SMARTS database system:

- a. Two storm water sample analyses for the time period July 1, 2015, through December 31, 2015. The Discharger uploaded only one analysis for that time period, which was dated December 21, 2015.
- b. Two storm water sample analyses for the time period July 1, 2016, through December 31, 2016.
- c. Two storm water sample analyses for the time period January 1, 2017, through June 30, 2017.

3. Failure to Collect Samples From Each Drainage Area at all Discharge Locations

Section XI.B.4 of the General Permit requires Dischargers to collect samples from all discharge locations, regardless of whether the discharges are substantially similar. Dischargers may analyze a combined sample consisting of equal volumes, collected from as many as four substantially similar discharge locations, provided that the Discharger submits a Representative Sampling Reduction Justification form with its sample analysis, and the samples are combined in the lab in accordance with Section XI.C.5 of the General Permit. Furthermore, Representative sampling is only allowed for sheet flow discharges or discharges from drainage areas with multiple discharge locations.

Pursuant to the Discharger's Storm Water Pollution Prevention Plan (SWPPP), the Facility has two sampling locations, which it refers to as Sampling Locations "SL-1" and "SL-2".

Further, during Inspector Keiran's January 6, 2016, inspection, he discussed the Facility sampling points with the Discharger, noting that there are two onsite - one pond and one drop inlet.

The Discharger failed to collect and analyze samples from both required discharge locations for its analyzed samples dated 12/21/15, 1/5/16 and 3/10/16. Notwithstanding the fact that the Discharger was ordered on January 6, 2016, by the Water Board to begin testing at both sampling points, it failed to do so for its test sample taken on March 10, 2016.

4. Failure to Analyze Storm Water Samples for the Correct Parameters

General Permit sections XI.B.6.a and XI.B.6.b require all Dischargers to analyze for the following three parameters, regardless of facility type: pH, Total Suspended Solids (TSS) and Oil & Grease (O&G). These parameters typically provide indication and/or the correlation of whether other pollutants are present in storm water discharge.

In addition to those minimum parameters, businesses that operate under certain industrial activities (SIC Codes) are required by Section XI.B.6.d to test for additional parameters, pursuant to Table 1 (Additional Analytical Parameters) of the General Permit, a copy of which is included with this Notice.

Pursuant to Table 1 of the General Permit, Zamaroni's SIC Code of 3273 (Concrete Ready-Mix), requires the Discharger to analyze for the additional parameters of Iron (Fe). Zamaroni's SIC Code of 2875 (Fertilizers, mixing only) requires the additional parameters of iron (Fe); total nitrogen (N+N); lead (Pb); zinc (Zn); and phosphorous (P).

The Discharger's laboratory analyses from Brelje & Race dated December 21, 2015, January 15, 2016 and March 10, 2016, all failed to test for the required parameters of iron, lead, zinc and phosphorus.

5. Failure to File A Timely Annual Report

Pursuant to Section XVI.A of the General Permit, all Dischargers must certify and submit via SMARTS an Annual Report no later than July 15th following each reporting year [July 1 through June 30 of each year], using the standardized format and checklists contained within the SMARTS database system.

As of the date of this Notice, Zamaroni has failed to upload an Annual Report for the time period July 1, 2016, through June 30, 2017.

6. Discharges in Violation of the General Permit

Section 402(p) of the Clean Water Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit such as the General Permit. 33 U.S.C. § 1342. Sections I.C.27 and III.A and B of the General Permit prohibit the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Section XXI.A of the General Permit requires Dischargers to comply with effluent standards or prohibitions established under section CWA 307(a) for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions.

Sections III and VI of the General Permit prohibit storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment; cause or threaten to cause pollution, contamination, or nuisance; cause or contribute to an exceedance of any applicable water quality standards in any affected receiving water; violate any discharge prohibitions contained in applicable Regional Water Board Water Quality Control Plans (Basin Plans) or statewide water quality control plans and policies; or contain hazardous substances equal to or in excess of a reportable quantity listed in 40 Code of Federal Regulations sections 110.6, 117.21, or 302.6.

Zamaroni's sampling and analysis results reported to the RWQCB confirm discharges of specific pollutants and materials other than storm water, in violation of the General Permit provisions listed above. Self-monitoring reports under the General Permit are deemed "conclusive evidence of an exceedance of a permit limitation." *Sierra Club v. Union Oil*, 813 F.2d 1480, 1492 (9th Cir. 1988).

Table 2 of the General Permit (TABLE 2: *Parameter NAL Values, Test Methods, and Reporting Units*) outlines specific Annual and Instantaneous Numeric Action Levels ("NALs) for common parameters. A copy of Table 2 is included with this Notice.

Date of Sample Collection	Drainage Collection Point	Parameter	Concentration in Discharge (mg/L)	NAL Annual/ Instantaneous NAL Value (mg/L)
12/21/15	SW-1	TSS	110	100/400
12/21/15	SW-1	N+N	.91	.68
1/15/16	SW-1	TSS	830	100/400
3/10/16	SW-1	TSS	400	100/400
3/10/16	SW-1	N+N	1.8	.68

The Discharger may have had other violations that can only be fully identified and documented once discovery and investigation have been completed. Hence, to the extent possible, CEPA includes such violations in this Notice and reserves the right to amend this Notice, if necessary, to include such further violations in future legal proceedings.

The violations discussed herein are derived from eye witness reports and records publicly available. These violations are continuing.

The Facility is located near the Santa Rosa and Mark West Creeks and the Laguna de Santa Rosa Watershed, tributaries of the Russian River – all waters of the United States. The Russian River is listed under the CWA as impaired for Nutrients (D.O., Nitrogen, Phosphorous), Pathogens (Indicator Bacteria), Metals (Mercury), Misc. (Temperature), and Sediment (Siltation). Receiving water concerns for the Facility are nitrogen, phosphorous and sediment, which is analyzed as TSS (suspended sediment). All illegal discharges and activities described in this Notice occur in close proximity to the above-identified waters. During storm events, the discharges are highly likely to discharge to said waters.

The RWQCB has determined that the watershed areas and affected waterways identified in this Notice are beneficially used for: water contact recreation, non-contact water recreation, fish and wildlife habitat, preservation of rare and endangered species, fish migration, fish spawning, navigation, and sport fishing. Information available to CEPA indicates the continuation of unlawful discharges of pollutants from the Facility into waters of the United States, specifically

the Russian River, in violation of the General Permit and the CWA. CEPA is informed and believes, and on such information and belief alleges, that these illegal discharges will continue to harm beneficial uses of the above-identified waters until the Discharger corrects the violations outlined in this Notice.

III. THE PERSON OR PERSONS RESPONSIBLE FOR THE VIOLATIONS

The entity responsible for the alleged violations is Zamaroni (“the Discharger”), including its parent companies, owners, operators and employees responsible for compliance with the CWA.

IV. THE LOCATION OF THE VIOLATIONS

The location of the point sources from which the pollutants identified in this Notice are discharged in violation of the CWA is Zamaroni’s permanent facility address of 3500 Petaluma Hill Road in Santa Rosa, California, and includes the adjoining navigable waters of the Mark West Creek, Santa Rosa Creek, the Laguna de Santa Rosa Watershed and the Russian River, respectively – all waters of the United States.

V. THE DATE, DATES, OR REASONABLE RANGE OF DATES OF THE VIOLATIONS

The range of dates covered by this 60-day Notice is from at least December 21, 2015, to the date of this Notice. CEPA may from time to time update this Notice to include all violations which may occur after the range of dates covered by this Notice. Some of the violations are continuous in nature; therefore, each day constitutes a violation.

VI. CONTACT INFORMATION

The entity giving this 60-day Notice is the California Environmental Protection Association (“CEPA”).

To ensure proper response to this Notice, all communications should be addressed as follows:

Xhavin Sinha, Attorney for
CALIFORNIA ENVIRONMENTAL PROTECTION ASSOCIATION
1645 Willow Street, #150
San Jose, CA 95125
Telephone: (408) 791-0432
Email: xsinha@sinha-law.com

VII. PENALTIES

The violations set forth in this Notice affect the health and enjoyment of members of CEPA who reside near and recreate in the Russian River. Members of CEPA use the Russian River for recreation, sports, fishing, swimming, hiking, photography, nature walks and the like. Their health, use and enjoyment of this natural resource is specifically impaired by the Discharger's violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including individuals, corporations, or partnerships, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), §1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. §1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to \$37,500 per day/per violation for all violations pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. See also 40 C.F.R. §§ 19.1-19.4.

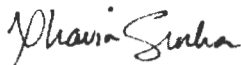
CEPA believes this Notice sufficiently states grounds for filing suit in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

VIII. CONCLUSION

The CWA specifically provides a 60-day notice period to promote resolution of disputes. CEPA encourages the Discharger and/or its counsel to contact CEPA or its counsel within 20 days of receipt of this Notice to initiate a discussion regarding the violations detailed herein.

During the 60-day notice period, CEPA is willing to discuss effective remedies for the violations, however, if the Discharger wishes to pursue such discussions in the absence of litigation, it is suggested those discussions be initiated soon so that they may be completed before the end of the 60-day notice period. CEPA reserves the right to file a lawsuit if discussions are continuing when the notice period ends.

Very truly yours,



Xhavin Sinha
Attorney for CALIFORNIA ENVIRONMENTAL PROTECTION ASSOCIATION

Enclosure

TABLE 2 – Parameter NAL Values, Test Methods and Reporting Units

S I N H A
L A W

60-Day Notice of Intent to Sue
September 25, 2017
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Copies to:

Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Jeff Sessions, U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Regional Administrator
U.S. EPA – Region 9
75 Hawthorne Street
San Francisco, CA, 94105

Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

TABLE 2: Parameter NAL Values, Test Methods, and Reporting Units

PARAMETER	TEST METHOD	REPORTING UNITS	ANNUAL NAL	INSTANTANEOUS MAXIMUM NAL
pH*	See Section XI.C.2	pH units	N/A	Less than 6.0 Greater than 9.0
Suspended Solids (TSS)*, Total	SM 2540-D	mg/L	100	400
Oil & Grease (O&G)*, Total	EPA 1664A	mg/L	15	25
Zinc, Total (H)	EPA 200.8	mg/L	0.26**	
Copper, Total (H)	EPA 200.8	mg/L	0.0332**	
Cyanide, Total	SM 4500-CN C, D, or E	mg/L	0.022	
Lead, Total (H)	EPA 200.8	mg/L	0.262**	
Chemical Oxygen Demand (COD)	SM 5220C	mg/L	120	
Aluminum, Total	EPA 200.8	mg/L	0.75	
Iron, Total	EPA 200.7	mg/L	1.0	
Nitrate + Nitrite Nitrogen	SM 4500-NO3- E	mg/L as N	0.68	
Total Phosphorus	SM 4500-P B+E	mg/L as P	2.0	
Ammonia (as N)	SM 4500-NH3 B+ C or E	mg/L	2.14	
Magnesium, total	EPA 200.7	mg/L	0.064	
Arsenic, Total (c)	EPA 200.8	mg/L	0.15	
Cadmium, Total (H)	EPA 200.8	mg/L	0.0053**	
Nickel, Total (H)	EPA 200.8	mg/l	1.02**	
Mercury, Total	EPA 245.1	mg/L	0.0014	
Selenium, Total	EPA 200.8	mg/L	0.005	
Silver, Total (H)	EPA 200.8	mg/L	0.0183**	
Biochemical Oxygen Demand (BOD)	SM 5210B	mg/L	30	

SM – Standard Methods for the Examination of Water and Wastewater, 18th edition

EPA – U.S. EPA test methods

(H) – Hardness dependent

* Minimum parameters required by this General Permit

**The NAL is the highest value used by U.S. EPA based on their hardness table in the 2008 MSGP.